

1 THE HONORABLE JAMES L. ROBART
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOHN DOES, et al.,

CASE NO. C17-0178JLR

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' JOINT MOTION TO
COMPEL**

**NOTE ON MOTION CALENDAR:
November 9, 2018**

JEWISH FAMILY SERVICE, et al.,

CASE NO. C17-1707JLR

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

(RELATING TO BOTH CASES)

This matter comes before the Court on Plaintiffs' Joint Motion to Compel. Having considered the parties' briefing, declarations, exhibits, and oral argument, if any, the Court GRANTS Plaintiffs' Joint Motion to Compel.

Accordingly, it is hereby ORDERED that:

1. Defendants' claim that the names of the 11 countries on the "SAO list" (or the "Security Advisory Opinions" list) is covered by a law enforcement privilege is denied, and Defendants are therefore ordered to produce to Plaintiffs any information redacted or withheld on that basis within 14 days of the date of this Order.

- 1 2. Defendants shall, within 14 days of the date of this Order, produce to Plaintiffs all
- 2 information redacted as “non-responsive” from the documents thus far produced. The
- 3 parties are directed to enter into a protective order to protect the personally identifiable
- 4 information of any individual refugees, as necessary.
- 5 3. Defendants shall, within 14 days of the date of this Order, produce to Plaintiffs
- 6 documents withheld as “non-responsive” that were attached to or hyperlinked in emails
- 7 Defendants produced, as well as those expressly incorporated in the documents
- 8 Defendants produced. This production shall include those documents identified as
- 9 “missing” on pages 3-4 of Plaintiffs’ letter dated October 4, 2018.
- 10 4. Defendants shall provide responses and any objections to Plaintiffs’ Fourth Set of
- 11 Interrogatories within 14 days of the date of this Order.
- 12 5. Plaintiffs are granted leave to take the depositions of Jennifer Higgins, Kelly Gauger,
- 13 and the Rule 30(b)(6) depositions reflected in the notices Plaintiffs served on October
- 14 17, 2018, at a time and place convenient to the parties and witnesses but no sooner than
- 15 14 days after the production of documents and information as set out in paragraphs 1-4
- 16 of this Order.
- 17 6. The deadline for completing discovery is extended for 35 days after the completion of
- 18 the depositions set out in paragraph 5 of this Order, with any discovery-related motions
- 19 due in 45 days of the close of discovery.
- 20 7. Defendants and their officers, agents, servants, employees, attorneys, and all members
- 21 and persons acting in concert or participation with them, from the date of this Order take
- 22 all steps necessary to comply with the terms of this Order.

23 **IT IS SO ORDERED.**

24 DATED this ____ day of _____, 2018.

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THE HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT JUDGE

1 Presented by:

2 /s/

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CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2018, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all of the registered CM/ECF users for this case.

DATED this 22nd day of October, 2018, at Seattle, Washington.

/s/ Tyler Roberts